

**IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO
CIVIL DIVISION**

Bruce Anca
6536 Tellea St.
Dayton, Ohio 45424

Plaintiff,

v.

Ale Dukic
1015 Runell Road
Louisville, KY 40214

and,

Gemini Transport, LLC
9680 Eagle St.
Dearborn, MI 48120

Defendants.

CASE NO.:

JUDGE:

**COMPLAINT FOR PERSONAL
INJURY**

Jury Demand Endorsed Hereon

Now comes Plaintiff, Bruce Anca (hereinafter, "Plaintiff"), by and through the undersigned counsel, and states for his Complaint against Defendants, as follows:

FIRST COUNT

1. On or about March 18, 2015, Plaintiff was operating a tractor-trailer traveling Southbound on Interstate 75, in the County of Montgomery, State of Ohio.
2. At said time and place, Defendant Ale Dukic, employee or agent of Defendant Gemini Transport, LLC, was operating a tractor-trailer owned or otherwise supplied by Defendant Gemini Transport, LLC, traveling Southbound on Interstate 75.
3. Defendant Ale Dukic recklessly operated said tractor-trailer and negligently failed to maintain an assured clear distance ahead, thereby striking the motor vehicle



ahead of his and causing a multi-vehicle collision, which included the motor vehicle operated by Plaintiff.

4. As a direct and proximate result of said negligence and as a direct and proximate result of said collision as described above, Plaintiff suffered physical pain and emotional distress thereby undermining his health and well-being.
5. Further, Plaintiff has suffered pain and will, with reasonable certainty, continue to so suffer in the indefinite future.
6. As a direct and proximate result of said negligence, Plaintiff was required to obtain medical care for his injuries and to expend sums of money, and he will with reasonable certainty, continue to require further medical care and treatment and pay additional sums therefore in the definite future.
7. As a direct and proximate result of said negligence, Plaintiff has incurred lost wages from employment in an amount not readily ascertainable at this time.
8. As a direct and proximate result of said negligence, Plaintiff has incurred medical bills in excess of Twenty Thousand Dollars (\$20,000.00).

SECOND COUNT

9. Plaintiff incorporates each and every allegation contained in paragraphs 1 through 8 of this Complaint as if fully rewritten herein.
10. Defendant Ale Dukic was acting within the scope of his employment or agency with Defendant Gemini Transport, LLC, or otherwise furthering the interests of Defendant Gemini Transport, LLC, on the occasion of the subject collision.
11. Defendant Gemini Transport, LLC is vicariously and otherwise responsible to Plaintiff for the negligence of Defendant Ale Dukic, and for Plaintiff's resulting injuries and losses.

WHEREFORE, Plaintiff demands judgment against Defendants, jointly and severally, in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00). Additionally, Plaintiff demands interest, costs incurred herein and any and all other just and equitable relief to which Plaintiff is entitled.

JURY DEMAND

Plaintiff demands a trial by jury in this action.

Respectfully Submitted,
Rafidi, Pallante & Melewski, LLC
By:

/s/ Jeffrey A. Pallante
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